Case 1:14-cr-00068-KBF Document 226 File



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The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

March 30, 2015

By Electronic Mail
Hon. Katherine B. Forrest
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Ross William Ulbricht, S1 14 Cr. 68 (KBF)

Dear Judge Forrest:

The Government writes respectfully to inform the Court that the complaint attached hereto as Exhibit A, which concerns a corruption investigation conducted by the U.S. Attorney's Office for the Northern District of California ("NDCA"), was unsealed today. The complaint charges Carl Force, formerly a Special Agent with the Drug Enforcement Administration, and Shaun Bridges, formerly a Special Agent with the U.S. Secret Service, with various corrupt actions stemming from their participation in a Baltimore-based task force that investigated the Silk Road website. These agents played no role in the separate Silk Road investigation led by the U.S. Attorney's Office for the Southern District of New York.

The U.S. Attorney's Office for the Southern District of New York provided assistance to the NDCA corruption investigation that resulted in the complaint against Force and Bridges, and, as the Court is aware, we disclosed the existence of the NDCA investigation to the Court and the defense in this matter in November 2014. A number of sealed submissions and orders were subsequently filed in this case relating to that disclosure, which are collected and attached hereto as Exhibit B (the "Sealed Filings"). The Sealed Filings were maintained under seal since the NDCA investigation was an ongoing grand jury matter that had not yet been publicly disclosed. Now that the attached complaint has been unsealed and the NDCA investigation is a matter of public record, the Government believes that the Sealed Filings may be unsealed.

Accordingly, the Government respectfully requests that the Sealed Filings be unsealed. The Government has consulted with defense counsel, who consents to this request.

Respectfully,

PREET BHARARA United States Attorney

By:

SERRIN TURNER

TIMOTHY T. HOWARD Assistant United States Attorneys Southern District of New York

Cc: Joshua Dratel, Esq. (by electronic mail)

So ordered.

KATHERINE B. FORREST

03/30/2015

United States District Judge